

Chief Magistrate Judge Brian A. Tsuchida

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM L. GALE,

Defendant.

NO. MJ19-603

COMPLAINT FOR VIOLATIONS

18 U.S.C. §§ 922(g)(1)

BEFORE, Chief United States Magistrate Judge, Brian A. Tsuchida, Seattle,
Washington.

The undersigned complainant, Jeffrey Sharp, Task Force Officer, Federal Bureau
of Investigation (FBI), being duly sworn states:

COUNT ONE

(Felon in Possession of a Firearm)

On or about November 17, 2019, in the City of Seattle, within the Western District
of Washington, WILLIAM L. GALE, knowing that he had been convicted of the
following crimes punishable by imprisonment for a term exceeding one year, to wit:

- a. *Unlawful Possession of a Firearm*, under cause number 11-1-06829-0, in
King County Superior Court, on or about October 28, 2011;
- b. *Assault in the Third Degree-DV*, under cause number 11-1-06829-0, in King
County Superior Court, on or about October 28, 2011;

1 c. *Felony Harassment-DV*, under cause number 11-1-06829-0, in King County
2 Superior Court, on or about October 28, 2011;

3 did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that
4 is, a Glock 9mm caliber handgun, said firearm having been shipped and transported in
5 interstate and foreign commerce.

6 All in violation of Title 18, United States Code, Section 922(g)(1).

7
8 This Complaint is based upon the following information:

9 **INTRODUCTION**

10 1. I am an “investigative or law enforcement officer of the United States”
11 within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of
12 the United States who is empowered by law to conduct investigations of, and to make
13 arrests for, offenses enumerated in Title 18, United States Code, Section 2516.

14 2. I was hired in 1998. I entered the Washington State Academy in
15 November 1998, and graduated in February 1999 with the necessary hours of training
16 completed. After completing the mandatory three months of student officer training, I
17 began my career with the SPD North Precinct in the patrol division. I worked in that
18 capacity from 1999 until 2007. From 2007 until 2014, I was assigned to the SPD North
19 Precinct Anti- Crime Team. From 2014 until the present, I have been assigned as a
20 detective in the Seattle Police Gang Unit. I have been a Task Force Officer assigned to
21 the FBI Safe Streets Task Force since 2017.

22 3. This affidavit is made based upon my personal knowledge, training,
23 experience and investigation, as well as upon information provided to me and my review
24 of reports prepared by other law enforcement personnel. This affidavit is made for the
25 purpose of establishing probable cause for this Complaint and thus does not include each
26 and every fact known to me concerning this investigation.

27 **SUMMARY OF INVESTIGATION**

28 4. On Sunday, November 17, 2019, SPD Officer Pecore #8331 was
conducting routine patrol in the East Precinct Pike/ Pine corridor. Part of this area was

1 the Mud Bay, located at 1526 Broadway. Officer Pecore described this parking lot as an
2 area known to have high gang and narcotic activity.

3 5. Officer Pecore was walking through the parking lot and observed a firearm
4 in the passenger seat rear pocket of a red Dodge Charger with Washington license plate
5 BPP0765. Officer Pecore took a closer look at the firearm, noted that it appeared to be a
6 semi-automatic pistol with an extended clear magazine. He could see that the clear
7 magazine was loaded with rounds of ammunition. Officer Pecore decided to keep the
8 vehicle under observation and to make contact with any occupants for a suspected SMC
9 12A.14.140 Unlawful Carrying of a Pistol violation. Officer Pecore kept watch over the
10 vehicle from approximately 0136 hours until 0208 hours, when a male, later identified as
11 WILLIAM L. GALE, walked toward the vehicle. Officer Pecore watched as GALE
12 opened the driver's side door. Officer Pecore detained GALE as he investigated the
13 firearm offense. At the time of his detention, GALE had the vehicle keys in his right
14 hand as he was being handcuffed. Officer Pecore then conducted a records check of
15 GALE and discovered that GALE had prior felony convictions for Unlawful Possession
16 of a Firearm, Assault in the Third Degree and Felony Harassment. Each of the offenses
17 carried a potential maximum sentence in excess of 12 months. During a search of GALE
18 incident to arrest, Officer Pecore located a holstered Glock 26 pistol with an extended 30
19 round magazine in his waistband. The pistol had a round in the chamber and an additional
20 25 rounds in the extended magazine. On 11/19/2019, at approximately 1400 hours, the
21 Glock 26 was test fired and was found to be an operable firearm.

22 6. I subsequently reviewed GALE's criminal history. Specifically, I reviewed
23 the Judgment and Sentence for cause number 11-1-06829-0 KNT. GALE was present for
24 the sentencing hearing and he not only signed the order imposing a sentence in excess of
25 twelve months, he also attached his fingerprints to the order. Additionally, he signed an
26 appendix to the order acknowledging that he was ineligible to possess a firearm because
27 of his felony convictions.
28

1 7. SA Catherine Cole, who is a trained and certified ATF Interstate Nexus
2 Agent, opined that the Glock model 26 pistol, chambered in 9mm (serial number:
3 TMH869), was not manufactured in the State of Washington and, therefore, it must have
4 crossed into Washington from another State.

5
6 **CONCLUSION**

7 8. Based on the foregoing, I respectfully submit that there is probable cause to
8 believe that WILLIAM L. GALE committed the offense alleged above.

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10 
11 _____
12 JEFFREY SHARP, AFFIANT
13 Task Force Officer, FBI

14 The above-named agent provided a sworn statement attesting to the truth of the
15 contents of the forgoing affidavit on the 17th day of December 2019. The Court hereby
16 finds that there is probable cause to believe the defendant committed the offense set forth
17 in the Complaint.

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19 _____
20 BRIAN A. TSUCHIDA
21 Chief United States Magistrate Judge